

1 PHILIP A. TALBERT  
Acting United States Attorney  
2 KEVIN C. KHASIGIAN  
Assistant U.S. Attorney  
3 501 I Street, Suite 10-100  
Sacramento, CA 95814  
4 Telephone: (916) 554-2700

5  
6 Attorneys for the United States

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13 v.

14 APPROXIMATELY \$60,000.00 IN U.S.  
CURRENCY,

15 APPROXIMATELY \$10,000.00 IN U.S.  
16 CURRENCY, and

17 ASSORTED MONEY ORDERS VALUED AT  
\$4,000.00 IN U.S. CURRENCY,

18 Defendants.  
19

CASE NO. 1:21-MC-00001-AWI

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

20 It is hereby stipulated by and between the United States of America and potential claimants  
21 Albert Corona and Coalinga Auto & Truck Diesel Repair (“claimants”), by and through their respective  
22 counsel, as follows:

23 1. On or about October 13, 2020, claimants filed a claim in the administrative forfeiture  
24 proceeding with the Drug Enforcement Administration with respect to Approximately \$60,000.00 in  
25 U.S. Currency, Approximately \$10,000.00 in U.S. Currency, and Assorted Money Orders valued at  
26 \$4,000.00 in U.S. Currency, which were seized on July 10, 2020 and July 23, 2020, (hereafter  
27 collectively “defendant funds”).  
28

2. The Drug Enforcement Administration has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was January 11, 2021.

4. By Stipulation and Order filed January 11, 2021, the parties stipulated to extend to March 12, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to April 11, 2021, the time in which the United States is required to file a civil complaint forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

///

///

///

///

///

///

///

///

///

///

6. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture shall be extended to April 11, 2021.

Dated: March 11, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant U.S. Attorney

Dated: March 11, 2021

By: /s/ Arturo Hernandez  
ARTURO HERNANDEZ  
Attorney for Potential Claimants  
Albert Corona and Coalinga Auto &  
Truck Diesel Repair  
(Signature authorized by email)

IT IS SO ORDERED.

Dated: March 12, 2021

  
\_\_\_\_\_  
SENIOR DISTRICT JUDGE